# IN THE UNITED STATE BANKRUPTCY COURT District of New Jersey

TO: JAMES J. WALDRON, CLERK

Case No. 17-35573-MBK

IN RE: Audrey Dixon

#### INFORMATION FOR NOTICE OF PROPOSED SETTLEMENT OF CONTROVERSY

Candyce I. Smith-Sklar, debtors counsel, proposes to settle a claim and/or action, on the terms described below.

If any creditor or other party in interest has an objection to the sale, the objection and a request for a hearing on such objection shall be in writing, served upon the trustee and filed with the Clerk of the United States Bankruptcy Court.

Such objection and request shall be filed with the Clerk and Served upon the person named below no later than December 4, 2019.

In the event an objection is timely filed, a hearing thereon will be held on December 11, 2019 @ 9:00am

if no objection to the settlement is filed with the Clerk and served upon the person named below as required above on or before twenty days from the date of this notice, the settlement will be consummated as proposed on or after twenty-five days from the date of this notice.

The settlement is as follows:

**NATURE OF THE ACTION**: Employment Discrimination settlement on behalf of Audrey Dixon

**TERMS OF THE SETTLEMENT**: Trustee will accept \$550,000 as full settlement of the claim. This includes Attorney's fees & costs to Schorr & Associates, P.C. in the amount of \$275,000.00 subject to Bankruptcy Court approval; this includes expenses in the amount of \$7,301.02. Net recovery of the debtor's estate to pay claims of creditors in the amount of \$1,453.14. Remaining settlement proceeds to be distributed to debtor in the amount of \$273,546.86.

Request for additional information about the nature of the action or the terms of the settlement should be directed to:

## **DEBTORS ATTORNEY:**

CANDYCE I. SMITH-SKLAR, ESQ. 1901 N. Olden Avenue, Suite 22 Ewing, NJ 08618 Tel: 609 882-9800

Fax: 609 538-1399

## **CHAPTER 13 TRUSTEE**

ALBERT RUSSO, TRUSTEE 1 AAA Drive, Suite 101 Robbinsville, NJ 08691 Tel: 609 587-6888

Fax: 609 587-9676

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**SUBMITTED BY:** 

/s/Candyce I. Smith-Sklar, Esquire Candyce I. Smith-Sklar, Esquire Attorney for Debtor

# STATEMENT OF SETTLEMENT

# **AUDREY DIXON**

Received in settlement of PI Case	\$550,000.00
Expenses to be reimbursed during the pendency	y of case\$
Expenses to be withheld for future expenses	\$
Attorney's Fee	\$275,000.00
Net Amount to Ms. Dixon	\$275,000.00
Proceeds of Settlement to the Chapter 13 Estate to pay all unsecured claims in full	
The claims to be paid are as follows: 4 and 5.	
FINAL AMOUNT TO DEBTOR	\$273,546.86
I have read the above and agreed to the disbursements as outlined. The debtor understand that if there are any outstanding bills, the debtor is responsible for them.	
/s/Audrey Dixon AUDREY DIXON	/s/Alan H. Schorr ALAN H SCHORR

Dated: November 5, 2019

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United States Bankruptcy Court
District of New Jersey

In re:

Audrey L. Dixon

Debtor

Case No. 17-35573-MBK
Chapter 13

## **CERTIFICATE OF NOTICE**

District/off: 0312-3 User: admin Page 1 of 2 Date Rcvd: Nov 25, 2019 Form ID: pdf905 Total Noticed: 22

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Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on
Nov 27, 2019.
                                        11 Feeder Street,
db
                  +Audrey L. Dixon,
                                                               Trenton, NJ 08608-1336
                 +Cenlar Mortgage, PO Box 77404, Ewing, NJ 08628-6404
+Aurora Financial Gr In, 900 N Route 73, Marlton, NJ
1 m
517241758
                                                                     Marlton, NJ 08053-1230
                 +City of Trenton Tax Office, PO Box 210,
                                                                     Trenton, NJ 08602-0210
517241763
                 +KML Law Group, PC, 216 Haddon Ave. Suite#406, Collingswood, NJ 08108-2812 +Summit Collection Services Inc, PO Box 306, Ho Ho Kus, NJ 07423-0306
517241767
517241769
517241770
                 +Summit Collection Svcs, Po Box 306, Ho Ho Kus, NJ 07423-0306
517241771
                  +Transnatl, 1162 St Georges Avenue, Avenel, NJ 07001-1263
                 +Trenton Water Works,
                                            City of Trenton,
517292959
                                                                   319 East State St., Room 113,
                    Trenton, NJ 08608-1809
                 +WESTLAKE FINANCIAL SERVICES,
517282767
                                                     PO Box 141419, Irving, TX 75014-1419
Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. smg E-mail/Text: usanj.njbankr@usdoj.gov Nov 26 2019 00:10:43 U.S. Attorney, 970 Broad St.,
                                                                                          U.S. Attorney,
                                 Rodino Federal Bldg.,
                                                            Newark, NJ 07102-2534
                  +E-mail/Text: ustpregion03.ne.ecf@usdoj.gov Nov 26 2019 00:10:38
                                                                                                 United States Trustee,
smq
                                                                                                                   Suite 2100,
                    Office of the United States Trustee,
                                                                1085 Raymond Blvd.,
                                                                                          One Newark Center,
                   Newark, NJ 07102-5235
517241759
                  +E-mail/Text: cms-bk@cms-collect.com Nov 26 2019 00:10:14
                                                                                         Capital Management Services, LP,
                    698 1/2 South Ogden Street, Buffalo, NY 14206-2317
                 +E-mail/Text: kzoepfel@credit-control.com Nov 26 2019 00:10:45
517241762
                                                                                               Central Loan Admin & R.
                 P.O. Box 77404, Trenton, NJ 08628-6404
+E-mail/Text: kzoepfel@credit-control.com Nov 26 2019 00:10:45
517241761
                                                                                               Central Loan Admin & R,
                    425 Phillips Blvd, Ewing, NJ 08618-1430
517241765
                 +E-mail/Text: bankruptcy_notifications@ccsusa.com Nov 26 2019 00:11:21
                    Credit Collections Services, Attention: Bankruptcy,
                                                                                   725 Canton Street,
                    Norwood, MA 02062-2679
517241766
                  +E-mail/Text: electronicbkydocs@nelnet.net Nov 26 2019 00:10:45
                                                                                                Dept Of Ed/582/nelnet,
                   Attn: Claims/Bankruptcy, Po Box 82505, Lincoln, NE 68501-2505
                  E-mail/PDF: resurgentbknotifications@resurgent.com Nov 26 2019 00:16:23
517363406
                 LVNV Funding, LLC its successors and assigns as, assignee of NCOP X, LLC, Resurgent Capital Services, PO Box 10587, Greenville, SC 29603-0587 +E-mail/Text: bankruptcy@savit.com Nov 26 2019 00:11:24 Savit Coll, Po
517241768
                                                                                                      Po Box 250.
                    East Brunswick, NJ 08816-0250
517289123
                 +E-mail/Text: electronicbkydocs@nelnet.net Nov 26 2019 00:10:45
                   US Department of Education c/o Nelnet,
                                                                 121 South 13th Street, Suite 201,
                    Lincoln NE 68508-1911
                 +E-mail/Text: peritus@ebn.phinsolutions.com Nov 26 2019 00:11:26
517873472
                    Westlake - C/O Peritus Portfolio Services, P.O. Box 141419,
517241772
                 +E-mail/Text: bankruptcynotice@westlakefinancial.com Nov 26 2019 00:10:40
                    Westlake Financial Srvs, Customer Care, Po Box 76809, Los Angeles, CA 90076-0809
                                                                                                           TOTAL: 12
             ***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****
               ##+CCI/Contract Callers Inc, Po Box 3000, Augusta, GA 30914-3000 ##+Condor Captl, 165 Oser Av, Hauppauge, NY 11788-3710
517241760
517241764
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TOTALS: 0, \* 0, ## 2

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 27, 2019 Signature: <u>/s/Joseph Speetjens</u>

District/off: 0312-3 User: admin Page 2 of 2 Date Rcvd: Nov 25, 2019

Form ID: pdf905 Total Noticed: 22

#### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 8, 2019 at the address(es) listed below:
Albert Russo docs@russotrustee.com

Candyce Ilene Smith-Sklar on behalf of Debtor Audrey L. Dixon mail@njpalaw.com, r56958@notify.bestcase.com

Denise E. Carlon on behalf of Creditor New Jersey Housing And Mortgage Finance Agency

dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com

Jason Brett Schwartz on behalf of Creditor Westlake Financial Services jschwartz@mesterschwartz.com

Rebecca Ann Solarz on behalf of Creditor New Jersey Housing And Mortgage Finance Agency rsolarz@kmllawgroup.com

U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 6